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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

J.B.,

Plaintiff,

NO. 3:23-cv-01962-CL

vs.

MOTION TO EXTEND CASE
MANAGEMENT DEADLINES

LEVI GRAY et al.,

Defendants.

Pursuant to LR 7-1(a), counsel for plaintiff certifies that she has conferred with defense counsel for the state defendants, and they do not oppose this motion. Plaintiff's counsel declines to confer with defendant Levi Gray due to prior hostile communications from Mr. Gray.

Pursuant to FRCP 6(b), the plaintiff moves the court to extend the case management deadlines by approximately five months as follows:

Close of Fact Discovery	November 7, 2025
Expert Disclosures	December 5, 2025
Rebuttal Reports	January 5, 2026
Close of Expert Discovery	February 2, 2026

Dispositive Motions/Joint ADR Report March 6, 2026

This unopposed motion is requested because the plaintiff and the state defendants have scheduled a settlement conference with Judge Beckerman for May 20, 2025. As a result, the plaintiff and the state defendants have decided to suspend the taking of multiple depositions (including plaintiff's deposition) until after the settlement conference, if necessary. Due to the multiple depositions and scheduling issues, it is expected to take some time until depositions can be completed. In addition, plaintiff is still waiting for numerous documents that have been request, but not yet provided. This motion is supported by the declaration of Lynn S. Walsh attached hereto.

DATED: March 21, 2025

/s/ Lynn S. Walsh
Lynn S. Walsh, OSB #924955
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that I mailed via first class mail and email the following Unopposed Motion to Extend Case Management Deadlines on March 21, 2025 to the following individuals:

Levi Gray
2232 SE Pine St. #7
Portland, OR 97214
levvus007@gmail.com

/s/ Lynn S. Walsh
Lynn S. Walsh, OSB #924955
Attorney for plaintiff